

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Annual Assessment of the Status of	)	MB Docket No. 12-203
Competition in the Market for the	)	
Delivery of Video Programming	)	

**REPLY COMMENTS OF  
City of Saint Paul, Minnesota**

The City of Saint Paul, Minnesota (City) submits these reply comments in response to the above-captioned Notice of Inquiry (“NOI”), released July 20, 2012, seeking “data, information, and comment on the state of competition in the delivery of video programming.”

The City’s cable television franchise requires the cable franchisee, currently Comcast, to provide seven (7) PEG channels serving the approximate 53,000 household subscribers within Saint Paul. The City is responsible for the management, operation and programming of City Cable Channel 18, the local government access channel for Saint Paul while the Saint Paul Neighborhood Network (SPNN), a non-profit community media center is contracted through an annual performance agreement with the City as the designated entity responsible for the operations of five (5) remaining PEG channels. The final access channel is Regional Channel 6 and is interconnected to all Twin Cities’ metro cable systems. This filing will focus on the City Cable Channel 18 and reply to comments filed by SPNN on September 11, 2012.

*Question: On which tier are these channels placed and is extra equipment required to view them?* All of the Saint Paul PEG channels are located on the Basic Service tier. The current rate for this tier is \$8.68 per month. The channels are all transmitted in analog Standard

Definition on the Basic Service tier. They are also available on the Digital Basic Service tier requiring additional equipment.

*Question: Are there more or fewer PEG channels carried on MVPD systems than were carried as of June 2010?* There has been no change to the number of PEG channels available on the cable system.

*Question: What data sources exist to track the availability of PEG programming?* The City keeps track of the number of programs and public meetings produced and made available on City Cable Channel 18.

*Question: Please answer if you are in an AT&T U-verse community.* N/A

PEG programming is a vital element of the Saint Paul community fabric. As noted in SPNN's September 11 filing, "Two hundred and sixty producers use the [SPNN] studios to produce 3600 hours of community based public access programming each year. ... Groups using the [SPNN] facilities and channels include ... Hmong, Khmer, Vietnamese, Karen Somali, Oromo, Eritrean, Ethiopian, Liberian, Catholic, Baptist, Lutheran, Conservative Judaism, Buddhist, Seventh Day Adventist, political parties, non-profit organizations and individuals." With Saint Paul's ever growing non-English speaking residential base, SPNN serves as a vital conduit in providing information to these residents through its variety of programs produced in their native languages.

The City of Saint Paul's government access video programming and coverage of government meetings and events serves as one of the key sources for providing both the City and Ramsey County residents with information on their local governments. In 2011, the City provided live and recorded coverage of 180 City and Ramsey County meetings. The Ramsey

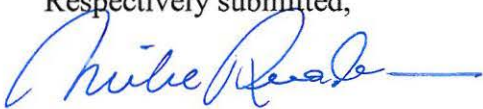
County meetings are transmitted to all Ramsey County residents through interconnection with neighboring communities.

In addition to telecasting these public meetings, the City produced 155 videos in 2011 for the general public. The general types of programs produced were:

- 55 – City Press/Events
- 49 – City Information “Stories”
- 37 - Public Service Announcements/Promos (Short, informative messages to educate/promote City information)
- 14 - Miscellaneous

As noted by SPNN in its September 11, 2012 filing, the transport of the City’s High Definition programming “is not available to Saint Paul viewers as Comcast provides PEG programming only in Standard Definition.” The City produces its programming in HD but unfortunately the high quality of the City’s programming is not able to be received by cable subscribers due to the placement of the PEG channels in the analog tier. It is essential for the City’s programming to be made available on the City’s government access channel in the same HD quality that the vast majority of cable subscribers are now expecting to receive.

Respectively submitted,



Mike Reardon

Cable Communications Officer  
City of Saint Paul  
15 West Kellogg Boulevard  
68 City Hall  
Saint Paul, Minnesota 55102

October 9, 2012